

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION**

CATHERINE ALEXANDER,

Plaintiff,

-VS-

TAKE-TWO INTERACTIVE SOFTWARE, INC..
2K GAMES, INC.; 2K SPORTS, INC.; WORLD
WRESTLING ENTERTAINMENT, INC.;
VISUAL CONCEPTS ENTERTAINMENT;
YUKE'S CO., LTD.; AND YUKE'S LA, INC.,

Case No. 3:18-cv-966-MJR-DGW

Defendants.

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26(c), Plaintiff Catherine Alexander (“Plaintiff”) and Defendants Take-Two Interactive Software, Inc., 2K Games, Inc., 2K Sports, Inc., and Visual Concepts Entertainment (collectively “Take-Two,” and together with Plaintiff, the “Parties”), by and through their attorneys, hereby jointly move this Court for entry of the Proposed Stipulated Protective Order submitted herewith as **Exhibit A**. In support of this motion, the Parties state as follows:

1. The Parties agree that during discovery in this matter, certain documents that may be disclosed by the Parties may contain confidential, proprietary, or private information for which special protection from public disclosure and from use for any purpose other than prosecuting this litigation may be warranted.

2. Accordingly, to expedite the flow of discovery material, conserve judicial resources, promote the prompt resolution of disputes over confidentiality, and facilitate the preservation of material deemed worthy of protection, the Parties conferred and agreed upon the

terms of the attached Proposed Stipulated Protective Order and respectfully request entry of the same.

3. Under Federal Rule of Civil Procedure 26(c)(1), a court may issue a protective order “for good cause” where the moving party certifies that it has “in good faith conferred or attempted to confer with other affected parties in an effort to resolve the dispute without court action.” The rule specifies that a court may issue an order “requiring that a trade secret or other confidential research, development, or commercial information not be revealed or be revealed only in a specified way.” *Id.* 26(c)(1)(G).

4. Good cause exists for entry of the Proposed Stipulated Protective Order, as numerous discovery requests served in this case seek sensitive, nonpublic business information. Indeed, courts have found good cause for entry of a protective order where a case requires disclosure of this type of confidential business information. *See, e.g., In re Yasmin & Yaz (Drospirenone) Mktg., Sales Practices & Prod. Liab. Litig.*, No. 3:09-MD-02100, 2011 WL 5507057, at *4–5 (S.D. Ill. Nov. 10, 2011) (finding protective order appropriate to govern disclosure of nonpublic research reports related to party’s products, nonpublic marketing materials that would be “highly valuable” to competitors, and unpublished intellectual property).

WHEREFORE, for the reasons stated herein, the Parties respectfully request that this Court enter the Proposed Stipulated Protective Order, attached hereto as **Exhibit A**.

Dated: November 28, 2018

THE SIMON LAW FIRM, P.C.

/s/ R. Seth Crompton (with consent)

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CERTIFICATE OF SERVICE

I hereby certify that on November 28, 2018, I electronically filed the foregoing **Joint Motion for Entry of Stipulated Protective Order** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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